

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Gawker Media, LLC, *et al.*,

Debtors

Chapter 11

Case No. 16-11700 (SMB)
Jointly Administered

Gawker Media, LLC,

Plaintiff,

v.

Meanith Huon, Ashley Terrill, Teresa Thomas,
Shiva Ayyadurai, Terry Gene Bollea, Charles
C. Johnson, and Got News LLC,

Defendants.

Adv. Proc. No. 16-ap-1085

**DEFENDANT TERRY BOLLEA'S
FIRST SET OF INTERROGATORIES TO PLAINTIFF**

TO: PLAINTIFF AND ITS COUNSEL OF RECORD

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, made applicable to this proceeding by Rule 7033 of the Federal Rules of Bankruptcy Procedure, Defendant Terry Bollea by and through his undersigned counsel, hereby request that Plaintiff Gawker Media, LLC answer in writing under oath the following interrogatories by June 24, 2016 at 12:00 pm.

INTERROGATORIES

INTERROGATORY No. 1: Identify all persons you intend to call at the evidentiary hearing on Debtor's Motion for (I) a Preliminary Injunction and/or (II) Extension of the Automatic Stay (the "Motion"). For each person, please provide (a) the person's full name, (b)

his/her contact information, (c) his/her employer, (d) job title, (e) employer's address, and (f) the topics about which he/she will testify at the evidentiary hearing.

INTERROGATORY No. 2: Provide the date(s) and specific times upon which the resolutions set forth in Debtor's Voluntary Petition for Non-Individuals Filing for Bankruptcy on pages 8 through 13 were approved.

INTERROGATORY No. 3: Provide the date(s) and specific times upon which the Resolutions of the Board of Directors of Gawker Media Group, Inc. ("GMGI") set forth in GMGI's Voluntary Petition for Non-Individuals Filing for Bankruptcy on pages 7 through 13 were approved.

INTERROGATORY No. 4: State the reasons why Nick Denton is "indispensable to the formulation, negotiation, and implementation of the Debtor's reorganization plan," as alleged in paragraph 13 of the Memorandum of Law in Support of Motion for TRO (Doc. 5).

Dated: New York, New York
June 17, 2016

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